



CALIFORNIA FARM BUREAU FEDERATION

NATIONAL AFFAIRS & RESEARCH DIVISION

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February 16, 2005

Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238
regulations@aphis.usda.gov

RE: Docket 04-085-1

VIA E-MAIL

To Whom It May Concern:

On behalf of the California Farm Bureau Federation, the state's largest farm organization, I am writing to support deregulation of glyphosate-resistant (or Roundup Ready) alfalfa. In correspondence with specialists from the University of California, it is my understanding that there are no overwhelming environmental, nutritional or market concerns which would prevent the deregulation of this product.

California leads the nation in alfalfa hay production and the state's annual dairy and beef production exceeds \$5 billion. It is clear that with our rise to the nation's leading dairy state that we have become critically dependent on a vibrant and forward-thinking forage industry, especially alfalfa production.

It is essential that we have access to technology that deals with the unique aspects of our state including increased pressure to reduce pesticides and to produce weed-free forage. Roundup Ready alfalfa allows for a small amount of one of the safest herbicides to be strategically applied, noticeably reducing pesticide usage. Furthermore, this tool would prove to be quite useful in a regulatory environment that encourages the use of certified weed-free hay in environmentally-sensitive federal grounds to prevent the spread of noxious weeds.

Field trials of Roundup Ready alfalfa have proven that when applied at the appropriate time, Roundup provided over 95 percent control of nearly all weeds. Allowing Roundup Ready alfalfa onto the market would increase options and provide more flexibility in weed control for alfalfa producers.

California Farm Bureau supports the federal government's process of deregulation that considers biotech crops on a case-by-case basis. While concerns regarding cross-pollination and herbicide resistant weeds continue to exist with the use of biotech crops, we recognize that with appropriate use of safe guards including buffer zones, and a sound rotation of herbicide usage, their conventional and organic counterparts should not be affected.

We urge the USDA to continue to utilize the best available science when making decisions on the deregulation of various biotech products. If the government finds that a biotech crop is scientifically and environmentally-sound, farmers should have the option to utilize it in their crop rotation practices.

Thank you for your time and consideration of this matter.

Sincerely,

A handwritten signature in cursive script that reads "Emily M. Robidart".

Emily M. Robidart
Director, Farm Policy, Taxes & Biotechnology